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8 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA, ) CR 10-00731 LHK  
14 Plaintiff, ) STIPULATION AND [PROPOSED]  
15 v. ) ORDER DOCUMENTING EXCLUSION  
16 DUNG QUOC VO, ) OF TIME UNDER SPEEDY TRIAL ACT  
17 Defendant. ) FROM MARCH 14, 2012 TO APRIL 4,  
18 ) 2012.

19 The defendant, Dung Quoc Vo, and the government together respectfully stipulate as follows:

- 20 1. A status conference or change of plea hearing in this matter is currently set for March 14,  
21 2012;  
22 2. The parties are conferring over a potential disposition. Additional facts regarding the case  
23 have come to light since the last status conference and require additional investigation by  
24 the government and the defense.

25 In order to provide time for this investigation, the parties request that the Court set the matter  
26 for change of plea or status conference on April 4, 2012, at 9:00 a.m. The parties jointly request  
27 that the Court exclude the period of time between March 14, 2012, and April 4, 2012, under the  
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STIPULATION AND ~~PROPOSED~~ ORDER  
RE SPEEDY TRIAL ACT

1 Speedy Trial Act for effective preparation of counsel, taking into account the exercise of due  
2 diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

3 IT IS SO STIPULATED.

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5 Dated: March 13, 2012

GEOFFREY A. HANSEN  
Acting Federal Public Defender

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8 /s/  
9 VARELL FULLER  
Counsel for Defendant

10 Dated: March 13, 2012

MELINDA HAAG  
United States Attorney

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13 /s/  
14 MICHELLE J. KANE  
15 Assistant United States Attorney

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17 ORDER

18 The Court finds that, taking into the account the public interest in the prompt disposition of govt  
19 criminal cases, granting the continuance until April 4, 2012, is necessary for effective preparation of  
20 counsel and of defense counsel. *See* 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). Given these circumstances, the  
21 Court finds that the ends of justice served by excluding the period from March 13, 2012, through  
22 April 4, 2012 outweigh the best interest of the public and the defendant in a speedy trial. *Id.* §  
23 3161(h)(7)(A).

24 Accordingly, and with the consent of the defendant, the Court (1) sets a hearing on April 4,

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28 STIPULATION AND ~~PROPOSED~~ ORDER  
RE SPEEDY TRIAL ACT

1 2012, at 9:00 a.m. and (2) orders that the period from March 14, 2012, through April 4, 2012, be  
2 excluded from Speedy Trial Act calculations under 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

3 IT IS SO ORDERED.

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5 Dated: 3/13, 2012  
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LUCY H. KOH  
United States District Judge

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